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By ECF

October 26, 2020

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, N.Y. 10007

Re: *Fernandez-Rodriguez et al. v. Licon-Vitale*, No. 20 Civ. 3315 (ER)

Dear Judge Ramos:

Pursuant to the Court's order of August 30, 2020, ECF No. 97, the parties write jointly to apprise the Court of the status of discovery in this matter.

Discovery that had previously been agreed to by the parties is well underway, with Interrogatories and Requests for Production served and answered by the dates set forth in the parties' letter of July 16, 2020 and the Court's order of August 30, 2020. ECF No. 90; ECF No. 97. Respondent produced non-email documents and information responsive to these requests on September 21, 2020 and October 6, 2020. Although Respondent has completed its collection of e-mails from the agreed upon custodians, in light of the parties' ongoing discussions to narrow the scope of the production, Respondent has not yet produced e-mails responsive to Petitioner's requests. The parties recently agreed to a narrowed scope of requests, however, and Respondent expects to begin producing e-mails soon. Respondent will endeavor to have production substantially complete by December 4, 2020.

Given that e-mail discovery remains outstanding, Petitioners have not yet determined what additional discovery (beyond what was previously agreed) may be necessary. The parties therefore respectfully request that the Court provide the parties until **December 18, 2020**, to file a joint letter regarding the need for further discovery.

Respectfully submitted,

s/ Arlo Devlin-Brown

Arlo Devlin-Brown
Andrew A. Ruffino
Alan Vinegrad
Timothy C. Sprague

cc: Counsel for Respondent (by ECF)